



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 9, 2019

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Richard Gaffey and Harald Joachim von der Goltz*, 18 Cr. 693 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter, with the consent of defense counsel, to request an extension to file its opposition to the Defendants' Motion to Compel the Government to Identify the Documents It Intends to Use at Trial (Dkt. No. 74) (May 7, 2019), which is presently due on May 22, 2019 (*see* Dkt. No. 79). The Government requests an extension until June 5, 2019 to respond. This is the first extension sought by the Government.

The Government requests this brief extension to file its opposition because the Government intends to engage in discussions with the defendants in an effort to provide to them additional information relevant to their requests. Accordingly, additional time would allow for the Government to meet and confer with the defendants and determine whether certain concerns raised by the defendants in their motion may be obviated. In addition, certain of Government counsel is scheduled to be out of the office for both official and personal travel during this period, and thus the requested extension will allow for counsel involved to have enough time to discuss the issues raised with the defendants.

A proposed endorsement for the Court's consideration is below.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

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By: /s/  
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Trial Attorneys, Criminal Division

cc: Defense Counsel (by ECF)

**ENDORSEMENT:**

On consent of the Defendants, the Government's request for an extension to respond to the Defendants' Motion to Compel the Government to Identify the Documents It Intends to Use at Trial (Dkt. No. 74) (May 7, 2019) until June 5, 2019 is hereby GRANTED.

SO ORDERED.

Date: May \_\_\_\_, 2019  
New York, New York

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HONORABLE RICHARD M. BERMAN  
UNITED STATES DISTRICT JUDGE